



# Polyurethanes

EPA-OTS



000888790/

90-890000003

(Trade Name)  
CONTAINS NO CBI

ORIGINAL

CERTIFIED MAIL

January 30, 1989

TSCA Document Processing Center (TS-790)  
Office of Toxic Substances  
Environmental Protection Agency  
Room L-100  
401 M Street S.W.  
Washington, DC 20460

Attention: CAIR Trade Name List

Dear Sir/Madam:

In accordance with the Federal Register Notice of December 22, 1988, ICI Polyurethanes Group, a business unit of ICI Americas, Inc., provides the following information as required by the Comprehensive Assessment Information Rule (CAIR) 40 CFR Part 704.208(a)(1).

ICI Polyurethanes Group manufactures Benzene, 1,3-diisocyanatomethyl (2,4-2,6 Toluene diisocyanate (TDI) CAS No. 26471-62-5). Our TDI is sold under the following trade names:

Trade Name

Rubinate® TDI 80/20

PBA-2279 (Formerly 4397-325)

These products are manufactured at our Geismar, LA production facility. All correspondence regarding these products should be addressed to:

ICI Polyurethanes Group  
Mantua Grove Road  
West Deptford, NJ 08066  
609-423-8300

**ICI Polyurethanes Group**

Mantua Grove Road  
West Deptford, NJ 08066  
USA

Telephone: (609) 423-8300  
(800) 257-5547

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Our technical contact on CAIR matters is:

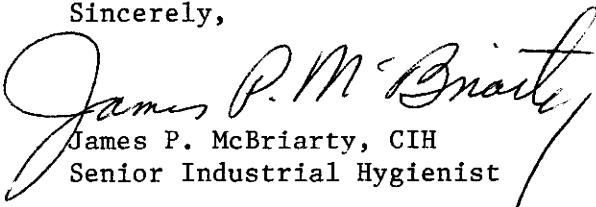
James P. McBriarty, CIH  
ICI Polyurethanes Group  
Mantua Grove Road  
West Deptford, NJ 08066

609-423-8356 or 302-575-4530

Please note that the result of our toluene diisocyanate manufacturing process is the substance with CAS No. 26471-62-5. This is a TSCA and CAIR listed substance and, thus, has been reported above. CAS No. 26471-62-5 can be composed of various concentrations of the 2,4 isomer of TDI (CAS No. 584-84-9) and the 2,6 isomer and 20 percent of the 2,6 isomer. Our TDI is not a mixture or blend of the 2,4 and 2,6 isomers of TDI, since we do not separately produce either of these isomers. Our TDI would also fit within CAS No. 1321-38-6 (unspecific TDI). All four of these CAS Numbers were listed in the December 22, 1988 Federal Register CAIR Notice. We have chosen to primarily report our TDI products under CAS No. 26471-62-5 since this is the most applicable to our product. The information on the other isomers may be considered secondary reporting classifications for our products. We, therefore, consider our trade name reporting obligation under 40 CFR Part 704.208 (a)(1) to be fulfilled for all isomers.

If you have any questions on this matter, please feel free to contact me at one of the above telephone numbers.

Sincerely,

  
James P. McBriarty, CIH  
Senior Industrial Hygienist

JPM/mcg